

EXHIBIT I

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May 16, 2014

VIA E-MAIL: mmiller@swartz-legal.com
AND FEDERAL EXPRESS OVERNIGHT

Matthew D. Miller, Esq.
Swartz Swidler, LLC
1878 Marlton Pike East, Suite 10
Cherry Hill, NJ 08003

Re: Jason Reed v. Empire Auto Parts, Inc.
Case No. 1:13-CV-05220-RMB-AMD

Dear Matt,

I enclose defendant's Answers to Plaintiff's First Set of Interrogatories, including disc containing production of documents, Bates stamped D000001-D000497.

Thank you for your cooperation.

Sincerely,


RICHARD L. HERTZBERG

RLH:vnb
Enclosures

GREENBAUM, ROWE, SMITH & DAVIS LLP
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Attorneys for Defendant,
Empire Auto Parts, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JASON REED,

Plaintiff,

v.

EMPIRE AUTO PARTS, INC.,

Defendant.

Case No. 1:13-CV-05220-RMB-AMD

DEFENDANT EMPIRE AUTO PARTS,
INC.'S ANSWERS TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES

TO: Matthew D. Miller, Esq.
SWARTZ SWIDLER, LLC
1878 Marlton Pike East. Ste. 10
Cherry Hill, NJ 08003
Attorneys for Plaintiff

COUNSEL:

Defendant, Empire Auto Parts, Inc. ("Empire"), responds to the Interrogatories served by plaintiff, Jason Reed, as set forth herein.

GENERAL OBJECTIONS

1. Empire objects to the Interrogatories to the extent that they are unreasonable, unduly burdensome, overly broad, vague and ambiguous, improperly assume facts and/or call for

production of documents that are not reasonably calculated to lead to discovery of admissible evidence.

2. Empire objects to the Interrogatories to the extent that they call for the disclosure of information in violation of the attorney/client privilege or work product doctrine and will answer no such Interrogatories.

3. Empire objects to the Interrogatories to the extent that they call for answers to legal questions and therefore call for legal conclusions.

4. Any specific answer to the Interrogatories is not an admission that any such information is relevant or admissible, but is only responsive to the Interrogatories.

5. Empire does not concede that any documents produced in answer to any Interrogatory are relevant to the subject matter of the within litigation or are reasonably calculated to lead to the discovery of admissible evidence. Empire reserves the right to object to the use of any documents produced in answer to any Interrogatory.

6. Empire reserves the right to supplement and amend its answers to the Interrogatories as additional information may be revealed during discovery.

INTERROGATORIES

1. Identify each and every wage payment and/or wage compensation policy, provision, guideline or procedure created, used or enacted in the three (3) years preceding August 30, 2013 (hereinafter "the relevant time period") for the purpose of wage payment to individuals employed by Defendant as delivery drivers or in positions with similar duties. This request includes, but is not limited to, identifying any policy regarding, relating, or concerning, overtime rate calculation, overtime compensation, meal break deductions, shift differential pay calculation, shift differential compensation, and wage and/or pay deductions. This request also includes all policies regarding to rounding and calculating compensable time. For each such policy and/or practice, identify (1) who drafted and implemented same; (2) each and every location of Defendant where such policy/practice is utilized; (3) the date when such policy was implemented; and (4) the date when such policy was terminated (if applicable).

ANSWER:

Defendant's policies are outlined in its handbook, which is provided to employees and which can be found on defendant's intranet site. Policies are communicated to employees in training sessions in or around the time of hiring and are reiterated in the course of employment. Among these policies is the requirement that drivers take a thirty-minute meal break and that they are responsible for keeping track of their meal breaks. All drivers are subject to these policies. It is believed that an employment consultant was hired in connection with the drafting and implementation of these policies.

2. Identify each and every policy and/or practice of Defendant used or enacted during the relevant time period regarding: 1) meal breaks taken by delivery drivers, 2) delivery route determination for delivery drivers, 3) clock-in and clock-out procedures for delivery drivers, 4) delivery drivers' operation of Defendant's vehicles, 5) interrupted meal breaks, and 6) GPS tracking of delivery drivers. For each such policy and/or practice, identify (1) who drafted and implemented same; (2) each and every location of Defendant where such policy/practice is utilized; (3) the date when such policy was implemented; and (4) the date when such policy was terminated (if applicable).

ANSWER:

Thirty-minute meal breaks are to be taken by each employee and this policy is found in the handbook, communicated at the time of hiring and is reiterated at various times in the course of employment. Delivery routes are determined with driver input based on customer needs, customer proximity to the warehouse and customer proximity to other customers. Drivers are to clock-in and clock-out upon entry in and upon departure from the warehouse. The use of company vehicles is governed by the terms set forth in the employee handbook and related materials produced herewith. Meal breaks should not be interrupted by work activities. To the extent unauthorized work during meal time occurs, drivers are to advise their superiors so appropriate adjustment can be made to compensation. GPS usage is controlled by the terms of documentation given to employees and provided herewith. These policies are uniformly applied. It is believed that an employment consultant was involved in drafting and implementation. The referenced policies were in place during the relevant time period.

3. Identify each and every system, program or procedure, including but not limited to, software and written and non-written policies, procedures, and/or systems, used or enacted during the relevant time period for the purposes of tracking, recording, categorizing, memorializing and/or monitoring all hours and/or time worked, whether considered compensable or not, for any current and/or former individuals employed by Defendant as delivery drivers.

ANSWER:

GPS, and ADP "time and attendance" systems are in place.

4. Identify each and every person who is/was responsible for and/or who participates/participated in paying, calculating and compiling information regarding any and/or all delivery drivers' wages and compensable time during the relevant time period.

ANSWER:

Steve Moskal.

5. Identify each and every location in which Defendant employs delivery drivers, and for each such location, identify any and all meal break deduction policies to which Defendant subjects delivery drivers.

ANSWER:

The main distribution center is located at 15 Jackson Road in Totowa, New Jersey. Satellite offices are maintained in Cinnaminson, New Jersey; Binghamton, New York; Cohoes, New York; Hicksville, New York; Kingston, Pennsylvania; and Rocky Hill, Connecticut. Automatic thirty-minute deductions apply for all drivers, and a driver should advise when he or she did not take an uninterrupted meal break.

6. For each current and/or former delivery driver employed by Defendant who is/was subjected to the same automatic meal break deduction policy as Plaintiff, identify:

- a. The employee's name, address, and phone number;
- b. The employee's ID number;
- c. The employee's job title;
- d. The exact amount of hours the employee was clocked into work during each pay period (i.e. the amount of time the employee's punch in and punch out records show);
- e. The exact amount of hours Defendant deducted from the employee for meal breaks each pay period;
- f. The amount of hours for which Defendant compensated the employee, including any overtime hours; and
- g. The location at which the employee worked.

ANSWER:

Last known names and addresses are as follows:

<u>DRIVER NAME</u>	<u>ADDRESS</u>
Abadia, Angel	261 East 25th St. Paterson, NJ 07514

Abbott, Charles D	504 Alfred Dr. Endwell, NY 13760
Acevedo, Carlos J	10 3rd St. Wayne, NJ 07470
Almanzar, Gabriel	437 Joralemon St. Apt. 2 Belleville, NJ 07109
Alvarado, Ezequiel	1806 Broad St. Hartford, CT 06114
Ayala, Daniel	2024 Stanley St. New Britain, CT 06053
Azcona, Juan Joel	437 7th Ave. Newark, NJ 07107
Badua, Marlon C	33 Boyden Parkway S. 2 nd Fl. Maplewood, NJ 07040
Baribault, Tyler R	PO Box 342 Marion, CT 06444
Barnes, Brian	69 Valentine Rd. Apt. 2 Bloomfield, NJ 07003
Bartnick, Carl	645 Hazle St. Wilkes Barre, PA 18702
Bealer, Jeffrey	105 Leconey Circle Palmyra, NJ 08065
Belanger, Russ	294 South Main St. Lot 31 East Windsor, CT 06088
Bellinger, Therman P	268 McLean Blvd. Paterson, NJ 07504
Bennett, Rick	287 Grove St. East Rutherford, NJ 07073
Blair, Oketo O	71 Lent Ave. Hempstead, NY 11550
Blink, Scott	394 East Ridge St. Nanticoke, PA 18634
Blue, Jerry W	421 South 3rd Ave. 2 nd Fl. Highland Park, NJ 08904

Brown, Matthew	257 Hoover Ave., Apt. 3 Bloomfield, NJ 07003
Buchanan, Tesfa	2 Sedeyen Court Clifton, NJ 07013
Caban, Carlos	177 New Britain Ave. Unionville, CT 06085
Cabrera, Carlos	429 E. 23 St. Paterson, NJ 07514
Caceres, Florencio	151 Broughton Ave. Bloomfield, NJ 07003
Camacho, Anthony	230 River Drive Garfield, NJ 07026
Camacho, Osvaldo	382 Boyd St. Camden, NJ 08105
Caraballo, Jose A	260 Vernon Ave. Paterson, NJ 07503
Carey, Kevin	3 New Dorp Place Melville, NY 11747
Carcione, James F	224 Fencsak Ave. Elmwood Park, NJ 07407
Chace, Glen	48 Stuyvesant Ave., 2 nd Fl. Lyndhurst, NJ 07071
Clark, Scott	3207 Route 26 Glen Aubrey, NY 13777
Colon, Hipolito	571 Hartford Rd., Apt. 10 Manchester, CT 06040
Czekala, Paul	437 Oak Hill Road Binghamton, NY 13901
Czerniak, Larry	90 10th Street Passaic, NJ 07055
Damato, Anthony	24 Spring Garden Lane Garfield, NJ 07026
D'Amico, John	614 Ringwood Avenue Pompton Lakes, NJ 07442

Davis, Nakia L	9 Edgewood St. Apt. 2 Hartford, CT 06112
De Dios, Jesus	96 Howe Ave., Apt. 1 Passaic, NJ 07055
DeLeon, Ronald	34 Jackson St., Apt. 1 Passaic, NJ 07055
Diamante, Michael	2 Preston Ct. Toms River, NJ 08757
Diaz, Anthony	455 Hazel St. Clifton, NJ 07011
Dispoto, Gabriel	82 New St. Nutley, NJ 07110
Dlugożima, Tomasz	247 Hayward Pl. Wallington, NJ 07057
Donnelly, Kevin	132 Loomis Rd. McDonough, NY 13801
Drobak, Robert	7 Church St. Binghamton, NY 13901
Dunham, Matthew	152 Upper Mannix Rd. East Greenbush, NY 12061
Emmi, David A.	67 Savitch Rd. Binghamton, NY 13901
Enright, John	2233 State Hwy 162 Esperance, NY 12066
Espanol, Edmund	7 Bartholdi Ave. Haskell, NJ 07420
Espenschied, Daniel R	813 Rancocas Ave. Riverside, NJ 08075
Falette, Cronaully	177 Granite Ave. Paterson, NJ 07522
Fernandez, Michael	245 Pierremount Ave. New Britain, CT 06053
Ferraiolo, Peter	104 Grove Ave. Verona, NJ 07044
Fields, Ramon B	33 Branch Brook Pl. Newark, NJ 07104

Flis, Peter	59 Cottage Pl. Garfield, NJ 07026
Flores, Jose R	254 Jefferson St. Hartford, CT 06106
Franco, Luis	62 Midland Ave. Garfield, NJ 07026
Franqui, Milagros	398 Lenox Ave. Uniondale, NY 11553
Furze, Peter L	42 Boulanger Ave. West Hartford, CT 06110
Gabriel, Damien	3 Mc Kenzie Ave. East Rutherford, NJ 07073
Gallagher, Daniel	140 Hudson St., Apt. 41 Hackensack, NJ 07601
Garcia, Jose J	125 Willet St. Passaic, NJ 07055
Garcia, Rubiany	163 Ivy St., Apt. 1 Kearny, NJ 07032
Gomez, Frankiln G	14 Alva St. Belleville, NJ 07109
Goode, Rawshawn	145 East 24th St. Paterson, NJ 07504
Gorner, Brian	45 Hawthorne St., #C-3 Bristol, CT 06010
Grados, Luis H	3 High St. Passaic, NJ 07055
Groppi, Martin	194 Lakeview Ave. Paterson, NJ 07503
Gross, Keith	57 Roosevelt Ave. Lodi, NJ 07644
Hall, Arnold	919 U S Rt 11, Apt 8C Kirkwood, NY 13795
Haq, Abdalrahman	127 22nd Ave. Paterson, NJ 07513
Helbing, Nelson	305 Ayla Lane Dalton, PA 18414

Huggins, Brandon	183 West 22nd St. Deer Park, NY 11729
Jaiprashad, Gobin	3092 Brower Ave. Oceanside, NY 11572
Jones, Jeffrey K	28 Mott St. Lawnside, NJ 08045
Johnson, Jevon	21 Federal St. Clifton, NJ 07011
Karalazarides, Lazaros	47 Gardner Ave. Hicksville, NY 11801
Keating, Alan	100 25th St., Apt. 548 Watervliet, NY 12189
Kendzulak, Paul	1504 State Route 435 Roaring Brook, PA 18444
Kerr, Brian	40 Beech St. Garfield, NJ 07026
Kishbaugh, Jeremy M	16 Crary St. Shickshinny, PA 18655
Komaromi, John	1035 Anna Maria Dr., Apt 307 Johnson City, NY 13790
Kravatsky, Steven W.	175 Gold St., Apt. R North Arlington, NJ 07031
Kruszewski, Mark	165 Ettore Drive Williamstown, NJ 08094
Loescher, Kurt C	610 West Park Ave. Lindenwold, NJ 08021
Lopes, Craig	40 Harvard Dr. East Hartford, CT 06108
Luciano, Angel	315 8th St., Apt 4r Union City, NJ 07087
Luk, Hing-Ping	128 Plauderville Ave #3 Garfield, NJ 07026
Maciag, Tomasz	28 Center Court Garfield, NJ 07026
Mallory, Karina M	10 Marshall St., Apt. 7M Irvington, NJ 07111

Matos, Reggie	62 Belden St. Hartford, CT 06120
Matos, Roger	135 48th St. Union City, NJ 07087
McCargo, Marcus	215 Wallace St. Orange, NJ 07050
McHugh, Christopher	150 Hughes St. Swoyersville, PA 18704
Medina, Alexmil	4 Watson Ave., Apt. 1-R East Orange, NJ 07018
Mysliwiec, Marcin	106 Monhegan St., 2 nd Fl. Clifton, NJ 07013
Narvaez, Dolores Jr.	232 Gregory Ave. Passaic, NJ 07055
Nieves, Wayne	109 Adelaide St. Hartford, CT 06114
Novak, Christopher	24 Shepard Pl. Nutley, NJ 07110
Olivo, David	124 Madison St. Paterson, NJ 07501
Olivo, Wilmer	35 Strong St. Wallington, NJ 07057
Oratio, Kenneth M	108 Lasalle Ave. Hasbrouck Heights, NJ 07604
Ortiz, Efrain	248 A Lakeview Ave. Clifton, NJ 07011
Ortiz, Raul	5 Saint Marys Pl. Belleville, NJ 07109
Ostrout, Charles	240 Spruce St. Manchester, CT 06040
Paflitzko, Gregory P	142 Silleck St., 1 st Fl. Clifton, NJ 07013
Pagan, Leonides	60 South Main St., Apt. 3C Lodi, NJ 07644
Pellett, Erik	42 Green Manor Dr. East Hartford, CT 06118

Peltier, Stephen	71 Central Ter., Apt. 2 Cohoes, NY 12074
Peralta, Cesar S	100 Pulaski St., Apt. 8 Dunellen, NJ 08812
Peterson, Joseph P	123 Bleeker St. Cohoes, NY 12047
Pierce, David J	118 Schoolhouse Lane Mount Laurel, NJ 08054
Pierre, Paul	1202 Erhardt St. Union, NJ 07083
Pimentel, Eddy L	90 Burgess Pl., Apt. 1 Passaic, NJ 07055
Ponce, Joseph	94 Summit Ave., 1 st Fl. Garfield, NJ 07026
Ponce, Luis	301 B Pershing Road Clifton, NJ 07012
Prazner, Ed	39 Somerset St. Wethersfield, CT 06109
Prus, Bruno D	172 Wallington Ave. Wallington, NJ 07057
Pugh Jr, Walter W	836 Bloomfield Ave., Apt. C5 Montclair, NJ 07042
Ramirez, Antonio	297 Harrison Ave. Garfield, NJ 07026
Ramirez, Ricardo	488 E 33th St., 1 st Fl. Paterson, NJ 07514
Ramos, Johathan	1223 N 33rd St. Camden, NJ 08105
Redzepi, Beran	134 Banta Ave. Garfield, NJ 07026
Reyes, Ernesto	209 Market St., Apt. 2 Garfield, NJ 07026
Rice, William G	52 Dorchester Dr. Dallas, PA 18612
Rivera, Jesus	84 Pacific Ave. Garfield, NJ 07026

Rivera, Jose A	362 N. 10th St., Apt. 2 Prospect Park, NJ 07508
Robertson, Timothy	6 Bob's Blvd. Binghamton, NY 13901
Robinson, James	615 Clay St. Riverside, NJ 08075
Rodriguez Martinez, Juan	57 Hudson St., Apt. 1 Dover, NJ 07801
Romero, Hector L	131 Brook St., Apt. 1-A Hartford, CT 06120
Rosa, Jonathan	102 Kensington Ter., Apt. 2 Passaic, NJ 07055
Russo, Emil	29 Knox Ter., Apt. 2C Wayne, NJ 07470
Rutcosky, Richard G	325 West End Ave. Haddonfield, NJ 08033
Saddlemire, John	71 Mary St., Apt. 1 Binghamton, NY 13903
Sams, Corey	1144 High Mountain Rd. North Haledon, NJ 07508
Santos, David	470 Van Bussum Ave. Garfield, NJ 07026
Savage, Thomas W	191 Colesville Rd. Binghamton, NY 13904
Sawalhi, Muneer I	66 Mountain Side Ter. Clifton, NJ 07011
Schanil, John E	22-14 Fairmont Pl. Fairlawn, NJ 07410
Schofield, Keith	1042 State Route 79 Richford, NY 13835
Schreiner, John	36 Carnation Rd. Levittown, NY 11756
Segarra, Richard	523 Grant St. Camden, NJ 08102
Segura, Jean C	29 Mac Arthur Ave., Apt. 2 Garfield, NJ 07026

Sergeev, Daniel	1219 4th Ave., Apt. 2 Watervliet, NY 12189
Sherifi, Migdat	536 Midland Ave. Garfield, NJ 07026
Smith, Christian T	365 Hoover Ave. Bloomfield, NJ 07003
Soria, Marco	57 Warren Ave. Roselle Park, NJ 07204
Stanek, Mariusz K	21 Stein Ave. Wallington, NJ 07057
Sypek, Scott	5 Tupelo Pl. Middletown, CT 06457
Tarbox, Andrew	646 Glendale Dr., Apt. 9 Endicott, NY 13760
Taveras-Genao, Jose R	508 East 24th St. Paterson, NJ 07514
Tongue, Kenneth	122 A Folsom Ave. Folsom, PA 19033
Torres, Alberto	927 Main Ave. Passaic, NJ 07055
Torres, Jeremy	180 Hamilton Ave. Clifton, NJ 07011
Torres, Joshua B	482 Paulison Ave. Passaic, NJ 07055
Travis, Brian D	23 Garden Ave. Mountain Top, PA 18707
Truty, Wieslaw	158 Anderson Ave. Wallington, NJ 07057
Vazquez, Eric	69 Cromwell St. Harford, CT 06114
Vega, Severo	1604 First St. Rensselaer, NY 12144
Waszkiewicz, Christopher	8 Kimball Drive, 1N New Britain, CT 06051
Williamson, David	275 Green St., Apt. 4F7 Edgewater Park, NJ 08010
Zalbert, Gene S	8 Whitman Ridge Dr. Melville, NY 11747

The balance of the information sought by this interrogatory exceeds the limited scope of precertification discovery.

7. For each policy and/or practice identified in the Defendant's response to Interrogatory Numbers 1 and 2, identify whether Defendant followed said policies and/or practices when compensating Plaintiff. If the answer is anything other than an unequivocal "yes," please identify each and every fact Defendant claims supports this determination and/or contention.

ANSWER:

Yes.

8. Identify each and every formula, program, rule or equation Defendant used during the relevant time period utilized in its Time and Attendance system (i.e. "Kronos") to calculate the compensable hours worked, wages, and/or overtime wages for any and all of Defendant's non-exempt hourly current and former employees. In particular, identify any and all rounding formulas, programs, rules, or equations which Defendant used during the relevant time period for calculating the amount of compensable time worked by Defendant's non-exempt hourly employees. For each, state the date enacted, the person(s) responsible for enacting same, and the employee(s) responsible for monitoring its usage.

ANSWER:

Defendant is unaware of any system named "Kronus." Defendant payroll is handled by ADP.

9. Identify the dates of Plaintiff's employment with Defendant; each and every position held by Plaintiff (including the dates when held); the job duties Plaintiff performed with each position held; who supervised Plaintiff in each position held; Plaintiff's rate of pay for each position held; the number of hours (or a good-faith approximation) that Plaintiff worked during each week of Plaintiff's employment; and the monthly monetary value of all benefits (e.g., health insurance benefits) Plaintiff was receiving at the time of Plaintiff's termination.

ANSWER:

Plaintiff worked as a delivery driver. The documents produced herewith contain responsive information.

10. For each and every workweek that Plaintiff was employed by Defendant, identify: (1) the most accurate time-records Defendant maintain which tracked Plaintiffs time for the week; (2) based on the most accurate time-records available to Defendant, the actual amount of time Plaintiff worked each week; (3) the amount of time Defendant paid Plaintiff for the week; and (4) the basis for any deductions made from Plaintiffs hours.

ANSWER:

The documents produced herewith contain responsive information.

11. Identify any job duties that Plaintiff was required to perform during his meal breaks.

ANSWER:

None.

12. Identify any and all discipline Defendant issued to Plaintiff, including the date(s) the discipline was issued; the person(s) responsible for issuing the discipline; the nature of the discipline (for example, whether the discipline was an unpaid or paid suspension, a written or verbal warning, a written or verbal counseling, etc.); the reason(s) the discipline was issued; and whether the discipline was ever memorialized in writing.

ANSWER:

Verbal and written disciplinary notice was issued on various occasions, which are produced herewith and plaintiff is referred to those documents in response to the request. Generally, violations related to reckless driving, sloppy record keeping and money management, smoking in company vehicles, and excessive and unauthorized stops.

13. Identify each and every workplace policy, procedure, and/or rule that Defendant contends Plaintiff violated during the last six (6) months of Plaintiff s employment.

ANSWER:

See answer 12 above along with disciplinary notices produced herewith.

14. Identify any written policies provided to Plaintiff regarding how he was to report work performed during a meal break.

ANSWER:

The written policy is that the employee is to keep track of meal breaks and is to report when compensation did not reflect working through a meal break. This includes circumstances where meal breaks were missed, but not accounted for.

15. Identify each and every payment made to Plaintiff for any and all work performed during a meal break during the relevant time period. If Defendant has not made such a payment, explicitly state same and state whether Defendant contends that this is because Plaintiff never worked during a meal break during the relevant time period.

ANSWER:

Defendant paid overtime to plaintiff. Unless plaintiff advised defendant that he worked through his meal break, defendant was unaware that plaintiff did so. Accordingly, defendant is not in a position to answer whether plaintiff ever worked through a meal break, unless he advised that he had done so. Records produced herewith reflect that Mr. Reed knew how to report when he missed a meal break and confirm that he was paid overtime as a result.

16. Identify each and every employee and/or former employee of Defendant who has made an informal or formal complaint (whether the complaint was oral or written; internally made - such as a complaint made to a supervisor, manager, or human resources representative of Defendant; or externally made

- such as a complaint filed with a Department of Labor or a Court of Law) at any time within the last five (5) years regarding any form of wage payment issues (such as a minimum wage or overtime compensation issue, or a failure to pay wages due issue).

ANSWER:

This request goes beyond the scope of limited precertification discovery.

17. Identify each and every person who has provided information and/or assisted in answering these interrogatories (excluding counsel) and identify all documents relied upon in answering same. If more than one person has provided information in compiling this information, identify with specificity each interrogatory that each for which each person has provided information.

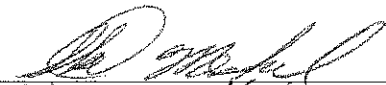
ANSWER:

Steve Moskal. Documents produced to plaintiff have been reviewed in preparing responses.

CERTIFICATION

As an officer or agent of this defendant, I hereby certify that the foregoing statements made by me are true to the best of my knowledge, information, and belief; and that I am authorized to provide the foregoing answers. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

EMPIRE AUTO PARTS, INC.

By: 
Name: Steve Moskato
Title: GM

Dated: May 16, 2014